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3 **UNITED STATES DISTRICT COURT**  
4 **NORTHERN DISTRICT OF CALIFORNIA**  
5 **OAKLAND DIVISION**

6 ROXANA DEL TORO LOPEZ and ANA  
7 MEDINA, on behalf of themselves, and all  
8 others similarly situated,

9 Plaintiffs,

10 v.

11 UBER TECHNOLOGIES, INC.,

12 Defendant.

Case No. 4:17-cv-06255-YGR

13 **SUPPLEMENTAL DECLARATION OF**  
14 **JENNIFER M. KEOUGH**  
15 **REGARDING FINAL ACCOUNTING**

16 I, JENNIFER M. KEOUGH, declare and state as follows:

17 1. I am Chief Executive Officer at JND Legal Administration (“JND”). The following  
18 statements are based on my personal knowledge and information provided to me by other JND  
19 employees working under my supervision and, if called on to do so, I could and would testify  
20 competently thereto.

21 2. JND is serving as the Settlement Administrator in the above-captioned litigation  
22 (“Action”) for the purposes of administering the Stipulation of Class Settlement and Release  
23 (“Settlement Agreement”) approved by the Court in its November 14, 2018 Order Granting Final  
24 Approval of Settlement and Final Judgment (“Order”).

25 3. JND is a legal administration services provider with its headquarters located in  
26 Seattle, Washington. JND has extensive experience in all aspects of legal administration, and has  
27 administered settlements in hundreds of cases.  
28

**SETTLEMENT FUND**

4. On November 21, 2018, JND received a wire from the Defendant in the amount of \$10,381,463.96.

**PAYMENTS FROM SETTLEMENT FUND**

5. On December 18, 2018, JND issued the following payments from the Settlement Fund:

A) Payments totaling \$2,652,958 to Plaintiffs' Counsel representing their fees and expenses in the settlement;

B) Payments totaling \$80,000 to the Class Representatives for their service to the Class; and

C) A payment of \$37,500 to the California Labor & Workforce Development Agency for PAGA penalties.

**CLASS MEMBER BENEFIT DETAILS**

6. Per the Court's Order and the Parties' Settlement Agreement, on December 18, 2018, JND mailed a total of 483 distribution checks totaling \$6,002,079.85 in net settlement and PAGA funds to the 483 Class Members in the Settlement. The average amount of the checks mailed to class members was \$12,426.67. The median was \$8,516.67. The largest check was for \$105,266.77, and the smallest was for \$22.58.

7. Additionally, beginning on December 18, 2018, JND managed the payment and reporting of taxes totaling \$1,499,894.66 to the various related federal and state agencies.

8. Where Class Members have contacted JND after JND issued the checks, JND has updated its records and re-mailed benefit checks as necessary. JND has also researched new addresses for any checks returned as undeliverable, and re-mailed checks to the updated addresses obtained from the research.

9. The Class Member checks are valid for 180 days after issuance and became void on June 16, 2019, excepting those checks for Class Members who have requested reissuance of the

1 checks. Reissued checks are valid for 30 days, and the latest stale date on any existing reissued  
2 check is August 4, 2019.

3 10. As of the date of this Declaration, Class Members have successfully negotiated 475 of  
4 the 483 issued checks, totaling \$5,968,682.54. Eight checks remain uncashed, totaling \$33,397.31.  
5 Of the eight uncashed checks, four have been reissued, totaling \$23,970.60, and JND expects these  
6 checks to be cashed.

7 **FEES AND COSTS**

8 11. As of the date of this Declaration, JND has accrued \$103,960.29 worth of fees and  
9 costs administering the settlement. JND expects to accrue an additional \$6,039.71 before settlement  
10 administration is complete.

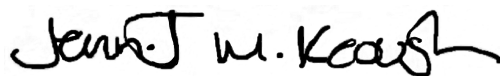
11 **HANDLING OF UNCLAIMED FUNDS**

12 12. JND has made its best efforts to ensure that all of the checks distributed to Class  
13 Members are cashed. Pursuant to the terms of the Settlement Agreement, any funds remaining after  
14 all outstanding reissued checks are cashed will be divided equally between Girls Who Code, the  
15 Mexican American Legal Defense and Educational Fund ("MALDEF") and the NAACP Legal  
16 Defense and Educational Fund.

17 13. Once the account balance reaches \$0.00, JND will close down the settlement fund  
18 and account.

19  
20 I declare under the penalty of perjury pursuant to the laws of the United States of America  
21 that the foregoing is true and correct.

22  
23 Executed on July 11, 2019, at Seattle, Washington.

24  
25 

26 JENNIFER M. KEOUGH  
27  
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